

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN (DUBUQUE) DIVISION

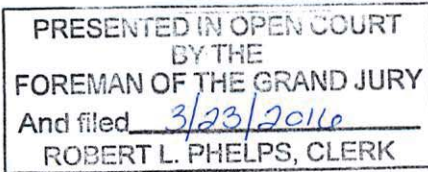
UNITED STATES OF AMERICA,

Plaintiff,

vs.

LANDON SHANE NATHANSON-LOVE
a/k/a "Landon Love," CAMRON ANDREW
PETE, JR. a/k/a "Dreadhead" a/k/a "Cam"
a/k/a "Cam Stunt Montana" a/k/a "Camron
Montana", and REGINALD DARNELL
SHAW, JR. a/k/a "Darnell Shaw, Jr." a/k/a
"T Darnell Shaw, Jr." a/k/a "Shaw",

Defendants.



No. 16-CR-1011-LRR

**SUPERSEDING
INDICTMENT**

Count 1

18 U.S.C. § 922(g)(3):
Prohibited Person in
Possession of a Firearm
(Nathanson-Love)

Count 2

18 U.S.C. § 922(a)(6): False
Statement in Relation to Sale
of Firearm
(Nathanson-Love)

Count 3

18 U.S.C. § 922(a)(6): False
Statements in Relation to
Sale of Firearm
(Nathanson-Love)

Count 4

18 U.S.C. § 922(d): Sale of
Firearm to a Prohibited
Person
(Nathanson-Love)

Count 5

18 U.S.C. § 922(g)(3):
Prohibited Person in
Possession of a Firearm
(Pete)

Count 6

18 U.S.C. § 922(g)(3), (g)(9):
Prohibited Person in
Possession of a Firearm
(Shaw)

The Grand Jury charges:

Count 1

Prohibited Person in Possession of a Firearm

From about February 15, 2016, through about February 16, 2016, in the Northern District of Iowa, defendant LANDON SHANE NATHANSON-LOVE, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Taurus Model TCP 738, .380 pistol, bearing serial number 17089E. At the time, defendant was an unlawful user of marijuana, a Schedule I controlled substance as defined in 21 U.S.C. § 802.

This was in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

Count 2

False Statement in Relation to Sale of Firearm

On or about February 15, 2016, in the Northern District of Iowa, defendant LANDON SHANE NATHANSON-LOVE, in connection with the acquisition of a firearm, namely, a Taurus Model TCP 738, .380 pistol, bearing serial number 17089E, from Tony's Jewelry & Loan, in the City of Dubuque, Iowa, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Tony's Jewelry & Loan, which statement was intended and likely to deceive Tony's Jewelry & Loan, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of

Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was not “an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance” when, in truth, defendant was an unlawful user of marijuana, a Schedule I controlled substance as defined in 21 U.S.C. § 802.

This was in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count 3

False Statements in Relation to Sale of Firearm

On or about September 11, 2015, in the Northern District of Iowa, defendant LANDON SHANE NATHANSON-LOVE, in connection with the acquisition of a firearm, namely, a Taurus PT111 Pro 9mm handgun, bearing serial number TEU86882, from Tony's Jewelry & Loan, in the City of Dubuque, Iowa, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made two false and fictitious written statements to Tony's Jewelry & Loan, and each such statement was intended and likely to deceive Tony's Jewelry & Loan, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that (1) defendant was not “an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance” when, in truth, defendant was an unlawful

user of marijuana, a Schedule I controlled substance as defined in 21 U.S.C. § 802; and (2) defendant was “the actual transferee/buyer of the firearm(s) listed on this form” when, in truth, defendant intended to purchase the said firearm for another person.

This was in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count 4

Sale of Firearm to Prohibited Person

Between about September 11, 2015, and December 1, 2015, in the Northern District of Iowa, defendant LANDON SHANE NATHANSON-LOVE knowingly sold a firearm, that is, a Taurus PT111 Pro 9mm handgun, bearing serial number TEU86882, to Camron Andrew Pete, Jr., knowing and having reasonable cause to believe that Camron Andrew Pete, Jr. was then an unlawful user of marijuana, a Schedule I controlled substance as defined in 21 U.S.C. § 802.

This was in violation of Title 18, United States Code, Sections 922(d) and 924(a)(2).

Count 5

Prohibited Person in Possession of a Firearm

From about December 1, 2015, through about December 5, 2015, in the Northern District of Iowa, defendant CAMRON ANDREW PETE, JR., did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Ruger 9E 9mm handgun, bearing serial number 335-55300, and a Taurus PT111

Pro 9mm handgun, bearing serial number TEU86882. At the time, defendant was an unlawful user of marijuana, a Schedule I controlled substance as defined in 21 U.S.C. § 802.

This was in violation of Title 18, United States Code, Sections 922(g)(3), 922(g)(9) and 924(a)(2).

Count 6

Prohibited Person in Possession of a Firearm

From about December 1, 2015, through about December 5, 2015, in the Northern District of Iowa, defendant REGINALD DARNELL SHAW, JR. did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Beemiller Hi Point C-9 9mm pistol, bearing serial number P1758713. At the time, defendant was an unlawful user of marijuana, a Schedule I controlled substance as defined in 21 U.S.C. § 802, and previously had been convicted of a misdemeanor crime of domestic violence, namely, in the State of Wisconsin, Circuit Court, Dane County, of one count of Class A Misdemeanor Battery, a violation of Wisconsin Statute 940.19(1) [968.075(1)(a) Domestic Abuse].

This was in violation of Title 18, United States Code, Sections 922(g)(3), (g)(9), and 924(a)(2).

KEVIN W. TECHAU
United States Attorney

By: *Timothy L. Vavricek*

TIMOTHY L. VAVRICEK
Assistant United States Attorney

A TRUE BILL

s/ Foreperson
Grand Jury Foreperson *[Signature]*

3/22/16
Date